

**To:** Olson, Erik[olson.erik@epa.gov]  
**From:** lbenfield@foley.com  
**Sent:** Fri 12/15/2017 3:49:34 PM  
**Subject:** U.S. EPA St. Francis Photos

Erik,

We have reviewed the photos you provided taken by the U.S. Environmental Protection Agency (“EPA”), at the inspection of the Container Life Cycle Management LLC (“CLCM”) St. Francis facility in May 2017. You provided these to us to review on December 5, 2017.

Pursuant to Title 40 Code of Federal Regulations Section 2.201 et. seq., CLCM declares that the vendor information, production rates/goals, and scrubber configuration contained in the files labeled (1) DC\_1775.jpg, (2) DC\_1776.jpg, and (3) DC\_1777.jpg are Confidential Business Information (“CBI”) and are proprietary, and are therefore protected as such from public disclosure.

Additionally, pursuant to Title 40 Code of Federal Regulations Section 2.201 et. seq., Title 5 United States Code Section 552a et. seq., and EPA Policy 2151.0: Privacy Policy dated September 27, 2007, CLCM declares that the files labeled (1) MOV\_1781.mp4 and (2) MOV\_1783.mp4, include video of CLCM employees and contain CBI and Personally Identifiable Information that is protected from public disclosure.

Please contact me with any questions.

*Linda E. Benfield*

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